

TWENTY-SIXTH EXPLOSIVES SAFETY SEMINAR

MIAMI, FLORIDA

AUGUST 16-18, 1994

THE U.S. ARMY ORDNANCE AND EXPLOSIVES WASTE (OEW) TASK FORCE

BACKGROUND

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendment and Reauthorization Act of 1986 (SARA), established the Defense Environmental Restoration Program (DERP). This program requires the Department of Defense (DOD) to identify, investigate, and clean up Ordnance and Explosives Waste (OEW), to include that which contaminates Formerly Used Defense Sites (FUDS). The Department of the Army (DA) has been designated as the service responsible for the execution of DERP for all FUDS, regardless of historical ownership.

As the investigative phase of FUDS DERP progresses, a number of basic problems have surfaced that are not addressed by current policy or DOD/DA regulations. These issues include the transportation, packaging, storage, and disposal of OEW and are of such magnitude as to be very difficult to resolve at the single major command (MACOM) level. This lack of guidance was made even more obvious by the discovery of World War I chemical munitions in the Spring Valley area of Washington, DC, in early 1993. In recognition of this policy void, the Commanding General of the U.S. Army Armament, Munitions and Chemical Command (AMCCOM) organized a FUDS conference on 28 June 1993 to formally identify these issues and propose solutions. Invitations to attend were extended to all of the Army's major proponents for oversight and accomplishment of DERP.

By the conclusion of the conference, attendees had specified sixteen separate issues that hinder or prevent the accomplishment of program goals. In order to address these issues in a coordinated and complementary manner, it was recommended that a DA task force be created to oversee the efforts of the various DERP proponents.

On August 19, 1993, the concept of an OEW Task Force was brought before Mr. Lewis D. Walker, Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health) (DASA[ESOH]), who sanctioned its establishment.

The chairman of the OEW Task Force is Mr. John L. Byrd, Jr., Director, U.S. Army Defense Ammunition Center and School (USADACS), Savanna, IL.

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TASK FORCE OVERVIEW

The OEW Task Force is considering both conventional ordnance and recovered chemical warfare materiel. It is supported by four subgroups which address specific issues. These subgroups are developing proposed solutions to be presented to the OEW Task Force for consideration as recommendations to be provided to the policy makers. Coordination has occurred to allow for the participation of the U.S. Environmental Protection Agency (EPA). Immediate emphasis is being placed upon resolution of the long term storage and disposal issue as it pertains to chemical and conventional FUDS OEW. The Task Force meets semiannually to review the progress of the subgroups on their assigned issues.

The first meeting of the OEW Task Force was held January 5, 1994 and an excellent cross section of Army OEW organizations were represented. On March 9, 1994, a status report was presented to Mr. Walker who commented favorably upon the issues identified and indicated his continuing support for the mission of the Task Force. The second meeting of the OEW Task Force was held June 30, 1994 and progress was noted on several issues initially identified. Some new issues were recognized and several new organizations attended for the first time. There was general agreement that this forum continues to be the most expeditious means by which important OEW issues are quickly identified and elevated to that level of Army leadership most appropriate for their resolution.

TASK FORCE MISSION AND PURPOSE

The general, overarching mission of the OEW Task Force is to provide a comprehensive picture of all aspects of the OEW remediation program in order to prevent duplication of effort, better allocate resources (money, manpower, and time), complement and leverage similar initiatives in other areas, and collect lessons learned for quick dissemination to all members. Such a continual status report on the OEW program will enable Army leaders to earlier predict its potential impact upon their organizations, thereby allowing them to develop long range strategies for support and participation within their resource base.

Though the Task Force was initially created to address those FUDS OEW issues for which there was no policy or precedent, its mission has been expanded to include those issues with collateral application/benefit to sites which are Army real property. As defined in its charter, the specific mission and purpose of the OEW Task Force is as follows:

1. Address and recommend resolutions to issues impacting the remediation of ordnance (conventional and chemical) at Formerly Used Defense Sites (FUDS) and active installations under the U.S. Army Installation Restoration Program (IRP), to include installations on Base Realignment and Closure (BRAC) lists.
2. Develop and recommend policy concerning the handling and ultimate disposition of both conventional and chemical munitions discovered during OEW surveys.

3. Serve as a sounding board and an advisory group to the DASA(ESOH)

TASK FORCE REPORTING CHAIN

The OEW Task Force will report directly to the DASA(ESOH) who has ultimate responsibility for the Army's environmental programs, and overall policy and guidance authority concerning all Army environmental matters. Such reporting will normally be accomplished through regular briefings provided to the OEESC which is chaired by the DASA(ESOH). The OEESC is an interagency committee whose Vice Chair is the Chairman of the Joint Ordnance Commanders Group, Major General Dennis L. Benchoff. Its mission is to "focus high level attention on critical ordnance-related environmental issues; to develop consensus, ensure coordination and disseminate information among the members; and to ensure that the total effort is pulled together and directed toward accomplishment of common goals and objectives." Its purpose is to develop a unified DOD position on common ordnance-related environmental and safety issues and clearly articulate and represent this position to legislative committees and regulatory agencies; analyze new legislation/regulations and provide standard guidance to DOD commands and activities; improve the identification and support of funding needs to ensure proactive compliance with current environmental requirements; and, exchange information and stimulate necessary research and development to solve environmental and safety problems involving ordnance related items to include disposal, range cleanup, ordnance detection and retrieval.

TASK FORCE SUPPORT STRUCTURE

The Task Force is supported by four subgroups whose missions are distinct yet mutually supportive. Three of the subgroups are focusing on specific, often technological, challenges while the Policies and Regulation Subgroup develops policy initiatives that will allow the implementation of proposed solutions. In that manner, the Policies and Regulation Subgroup serves as a conduit and clearinghouse for information from all subgroups being presented to the Task Force executive membership.

The Onsite Treatment and Transportation Subgroup is addressing those issues concerning OEW remediation at the FUDS itself. The intention of the Task Force is to emphasize onsite treatment and this subgroup is considering existing methods that can be improved to attain additional levels of safety for the public and the environment, as well as new methods which promise to achieve the same or better. Since onsite treatment will prove to be unfeasible in some circumstances, this subgroup is developing technical proposals for the transportation of OEW offsite, to include packaging and tiedown methods and equipment. This subgroup is also examining the preparation of the plans necessary for movement and treatment of OEW, to include coordination with state and local officials.

The Execution and Cleanup Subgroup is considering those issues involving the detection, excavation, and removal of UXO and OEW on FUDS. It is monitoring the development of

the technology that will create equipment to protect individuals, property, and the public during remediation operations and detect UXO at reasonable depths, determine its content, and allow for safe excavation. Emergency response operations, such as those requiring the deployment of Explosive Ordnance Disposal (EOD) teams, Service Response Forces, or the Technical Escort Unit (TEU), are also being scrutinized.

The Long-term Storage and Treatment Subgroup is identifying facilities and locations to be made ready and available should the need arise to move OEW offsite. The need for temporary storage site(s) for OEW prior to treatment is being examined. Recommendations are being made concerning the advisability of establishing a single national location or several regional sites or numerous state facilities for storage and treatment. Coordination and cooperation with state and local officials and regulators is being emphasized. All collateral issues arising from a decision to store and treat OEW offsite are being addressed, to include Environmental Impact Statements (EIS), compliance with hazardous waste regulations, and budgetary requirements.

The Policies and Regulation Subgroup is focusing on the development and proposal of implementing initiatives that will allow the use of those items and procedures devised within the other subgroups. Analysis of the potential effects of new legislation, regulations, or rulings is also being stressed. Emphasis is being placed upon the collection of all existing policies and guidelines that affect OEW remediation operations into a single document that can be easily referenced by operators as they go about their business. This subgroup is closely monitoring the progress of the other three to ensure that policy allowances are in effect at a time coincident with the final granting of approvals for new technology, methods, or approaches.

TASK FORCE METHODOLOGY

Prior to the first meeting of the Task Force, the original 16 issues had been expanded to 25 and assigned to the various subgroups according to their purpose. The subgroups analyzed their issues and developed an information paper for each issue in the following format:

- * **ISSUE:** a short definition of the problem
- * **STATUS:** either RED, AMBER, or GREEN
- * **DISCUSSION:** a detailed account of the concerns, challenges, and current situation
- * **REMAINING ACTIONS:** a list of those actions which are likely to or should occur in the near future, as best can be foreseen
- * **RECOMMENDATION(S):** a list of those actions deemed necessary to resolve this issue, to include taskers or taskings

The Task Force will review the progress being made on each issue during the semiannual meetings and provide guidance, coordination, and assistance to the responsible organizations should obstacles be identified that appear to be insurmountable. Issues can then be elevated to higher levels of authority for consideration/resolution should that method be deemed necessary.

The STATUS colors are indicative of the situation confronting that particular issue at the present time and represent the following circumstances:

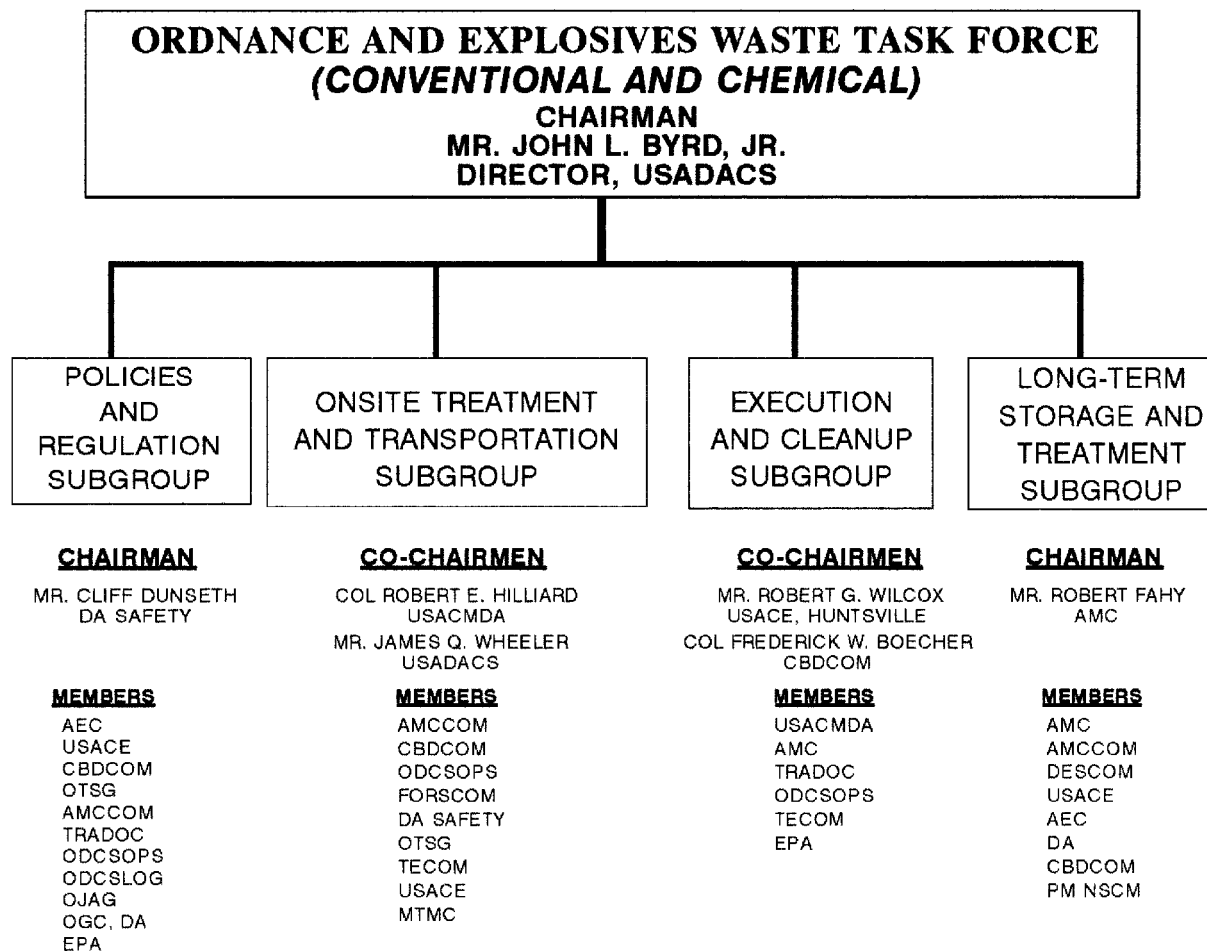
- * RED indicates a state of affairs that requires either technological achievements, advancements, or breakthroughs; or new policy initiatives and/or changes; or a combination of both, before the Army can resolve this matter
- * AMBER indicates that progress is being made towards resolution of this issue; e.g., the technology has been developed, but is not yet approved for Army/government use or a policy modification is necessary to allow its use, OR, vice versa, the policy is in place, but the technology is not yet there
- * GREEN indicates that this issue, as defined within this Task Force, has been satisfactorily resolved - the issue will be dropped from the list after one presentation to the Task Force membership and mention in the meeting minutes, or the issue may be rewritten or reassigned to another subgroup as the situation evolves

SYNOPSIS OF BRIEFING TO THE TWENTY-SIXTH EXPLOSIVES SAFETY SEMINAR

The attached charts outline the composition of the OEW Task Force and the issues it has currently identified for consideration. While each of the 25 issues has its own information paper, as described above, only a summary of these issues, by subgroup and status, has been included, save for the following issues which may be of interest to seminar attendees:

- * RISK BASED CLEAN-UP STANDARDS
- * SAFETY/OPPLAN REVIEW AND APPROVALS
- * STORAGE OF OEW
- * TRANSPORTATION OF OEW
- * CERTIFICATION PROGRAM FOR OEW WORKERS AND TRANSPORTERS

The fact sheets for these issues have been included in this package; should other issues be of interest to attendees, please contact the speaker or the Director, USADACS, ATTN: SMCAC-DO, Savanna, Illinois, 61079-9639, for additional information.



VIEWGRAPH 1

ORDNANCE AND EXPLOSIVES WASTE (OEW) TASK FORCE (CONVENTIONAL AND CHEMICAL)

SUMMARY OF SECOND MEETING 30 JUNE 1994

- **PROGRESS HAS BEEN MADE ON SOME INITIAL ISSUES**
- **NEW ISSUES HAVE BEEN IDENTIFIED**
- **DEVELOPMENT OF NATIONAL STRATEGIES FOR MANAGEMENT OF CHEMICAL AND CONVENTIONAL OEW WAS RECOMMENDED**
- **IMMEDIATE EMPHASIS WILL BE PLACED ON THE ASSIGNMENT TO AN ARMY MACOM OF THE MISSION FOR LONG-TERM STORAGE AND TREATMENT OF CONVENTIONAL OEW**
- **SOME EXCELLENT INTERACTION BETWEEN ORGANIZATIONS CONCERNING POTENTIAL TECHNOLOGY INITIATIVES AND THE IDENTIFICATION OF POSSIBLE FUNDING SOURCES**
- **ATTENDEES AGREED THAT THIS FORUM CONTINUES TO BE THE MOST EXPEDITIOUS MEANS BY WHICH IMPORTANT OEW ISSUES ARE QUICKLY IDENTIFIED AND ELEVATED TO THAT LEVEL OF ARMY LEADERSHIP MOST APPROPRIATE FOR THEIR RESOLUTION**
- **CHARTER IS BEING FINALIZED FOR APPROVAL**
- **AN UPDATE BRIEFING WILL BE PREPARED FOR PRESENTATION TO THE NEXT MEETING OF THE ORDNANCE EXECUTIVE ENVIRONMENTAL STEERING COMMITTEE (OEESC)**
- **MEMBERSHIP CONTINUES TO GROW AS OTHER ORGANIZATIONS EXPRESS INTEREST:**
 - **US ARMY PACIFIC**
 - **MILITARY DISTRICT OF WASHINGTON**
 - **NATIONAL GUARD BUREAU**

ORDNANCE AND EXPLOSIVES WASTE (OEW) TASK FORCE (CONVENTIONAL AND CHEMICAL)

SYNOPSIS OF OEW ISSUES, STATUS, AND OPR

<u>ONSITE TREATMENT AND TRANSPORTATION SUBGROUP</u>	<u>STATUS</u>
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- **PLANS FOR TRANSPORTATION AND TREATMENT OF RED CWM ARE REQUIRED**

OPR: PM NSCM

- **TREATMENT/DESTRUCTION CAPABILITY FOR AMBER CWM NEEDS TO BE DEMONSTRATED**

QPR: PM NSCM

- **AR 50-6, CHEMICAL SURETY REGULATION, PLACES AMBER STRINGENT REQUIREMENTS ON STORAGE AND HANDLING OF CHEMICAL SURETY MATERIEL (CSM)**

OPR:DCSOPS

- **ALTERNATE TREATMENT TECHNOLOGIES ARE RED NEEDED FOR CONVENTIONAL OEW AND CONTAMINATED SOILS**

OPR:USADACS

ORDNANCE AND EXPLOSIVES WASTE (OEW) TASK FORCE (CONVENTIONAL AND CHEMICAL)

SYNOPSIS OF OEW ISSUES, STATUS, AND OPR

EXECUTION AND CLEANUP SUBGROUP

STATUS

- **FUDS MUST BE INCLUDED UNDER POLICY IN DASA(IL&E) GREEN
MEMO DATED 1 NOV 93, SUBJECT: APPLICATION OF RCRA
TO CONVENTIONAL EXPLOSIVE ORDNANCE OPERATIONS**

OPR: DASA(ESOH)

- **DEVELOP MOA BETWEEN USACE AND EOD HQ AMBER**

OPR: USACE!FORSCOM/52D ORD GROUP (EOD)

- **BRAC PROGRAM CONSIDERS OEW CONTAMINATION RED
TOO LATE IN THE PROCESS**

OPR: ASA(IL&E)

- **FUDS UNDER DOD OPERATIONAL CONTROL AFTER AMBER
TRANSFER OF OWNERSHIP**

OPR: AEO/USACE

- **THE CURRENT SERVICE RESPONSE FORCE MANUAL AMBER
DOES NOT FIT SITUATIONS LIKE SPRING VALLEY VA**

OPR: CBDCOM

- **THE CRITERIA FOR TERMINATION OF THE EMERGENCY AMBER
PHASE NEEDS TO BE PRE-APPROVED BY REGULATORY
AGENCIES**

OPR: CBDCOM

ORDNANCE AND EXPLOSIVES WASTE (OEW) TASK FORCE (CONVENTIONAL AND CHEMICAL)

SYNOPSIS OF OEW ISSUES, STATUS, AND OFFICE OF PRIMARY RECORD (OPR)

LONG-TERM STORAGE AND TREATMENT SUBGROUP

STATUS

- **DESIGNATION OF LONG-TERM STORAGE AND RED
TREATMENT SITE FOR TOXIC CHEMICAL OEW**

OPR: HQ.AMCIPMNSCM

- **DESIGNATION OF LONG-TERM STORAGE AND RED
TREATMENT SITE FOR CONVENTIONAL OEW**

OPR: HQ. AMC

ORDNANCE AND EXPLOSIVES WASTE (OEW) TASK FORCE (CONVENTIONAL AND CHEMICAL)

SYNOPSIS OF OEW ISSUES, STATUS, AND OFFICE OF PRIMARY RECORD (OPR)

<u>POLICIES AND REGULATION SUBGROUP</u>	<u>STATUS</u>
◦ MULTIPLE POLICIES AND REGULATIONS RELATING TO OEW OPERATIONS	RED
<u>OPR:DASA (ESOH)</u>	
◦ ALL NECESSARY ELEMENTS WITHIN THE ARMY ARE NOT OFFICIALLY TASKED TO PARTICIPATE IN FUDS RESPONSE ACTIONS	RED
<u>OPR:ASA(IL&E)</u>	
◦ STORAGE OF OEW	RED
<u>OPR:AMC/USACE</u>	
◦ TRANSPORTATION OF OEW	RED
<u>OPR:AMC/MTMC</u>	
◦ FINAL DISPOSITION OF OEW	RED
<u>OPR: OPR: USACE</u>	
◦ RISK BASED CLEAN-UP STANDARDS	AMBER
<u>OPR:DA SAFETY</u>	
◦ CERTIFICATION PROGRAM FOR OEW WORKERS & TRANSPORTERS	RED
<u>OPR:USACEIODCSLOG</u>	

ORDNANCE AND EXPLOSIVES WASTE (OEW) TASK FORCE (CONVENTIONAL AND CHEMICAL)

SYNOPSIS OF OEW ISSUES, STATUS, AND OPR

POLICIES AND REGULATION SUBGROUP (CONTINUED)

STATUS

- **LIMITATIONS ON TECH ESCORT UNIT DURING CWM RED OPERATIONS**

OPR: USACEICBDCOM

- **APPLICABILITY OF AR 50-6, CHEMICAL SURETY, TO RED RECOVERED CHEMICAL WARFARE MATERIEL (RCWM)**

OPR: ODGSOPS

- **POLICY FOR ONSITE TREATMENT/DISPOSAL OF CWM RED**

OPR: USACMDA(CWM)IUSADACS(CONVENTIONAL OEW)

- **PROTECTIVE SHELTERS AMBER**

OPR: USACE/CBDCOM

- **SAFETY/OP PLAN REVIEW AND APPROVALS AMBER**

OPR: DASAFTY

- **USE OF COMMERCIAL PPE BY ARMY AND AMBER CONTRACTORS DOING CWM REMEDIATION**

OPR: DASAFTYICBDCOM

POLICY AND REGULATION

- **ISSUE: RISK BASED CLEAN-UP STANDARDS**
- **STATUS: AMBER**
- **DISCUSSION**
 - **HOW CLEAN IS CLEAN? DEPTH AND PPM MAY NOT ALWAYS BE THE PROPER CRITERIA.**
 - **CURRENT GUIDANCE IS THAT ALL EXPLOSIVES/AMMUNITION MUST BE REMOVED, WHICH MAY BE MORE HAZARDOUS THAN LEAVING THE CONTAMINATION IN PLACE.**
 - **USATCES DRAFT STANDARD, NOT RISK-BASED, FOR DASA(IL&E) REVIEW**
 - **USACE, HUNTSVILLE, HAS DEVELOPED PRIORITIZATION METHODOLOGY BASED ON RISK AND COST**
 - **FORT ORD PLAN USED QUALITATIVE APPROACH**
 - **CLEARANCE CERTIFICATION**
- **REMAINING ACTIONS:**
 - **REVIEW ONGOING AUSTRALIAN OEW REMEDIATION PROJECTS FOR LESSONS LEARNED AND EXTANT TECHNOLOGY**
 - **DA SAFETY IN COORDINATION WITH USACE, DETERMINE REMEDIATION REQUIREMENTS**
- **RECOMMENDATION:**
 - **ESTABLISH ARMY REMEDIATION STANDARDS**
 - **COORDINATE WITH EPA**

OPR: DA SAFETY

POLICY AND REGULATION

- **ISSUE: SAFETY/OP PLAN REVIEW AND APPROVALS**
- **STATUS: AMBER**
- **DISCUSSION**
 - **SPRING VALLEY RESPONSE EFFORT IS NOT THE DESIRED MODEL AND SHOULD BE USED ONLY FOR LESSONS LEARNED**
 - **DRAFT AR 385-64, CHAPTER 8, ESTABLISHES APPROVAL CHAIN**
 - **NO ESTABLISHED FORMAT EXISTS**
 - **LEAD TIME FOR PLAN PREPARATION BETWEEN THE DECISION TO PROCEED WITH REMEDIATION AND THE ACTUAL COMMENCEMENT OF OEW REMOVAL OPERATIONS**
- **REMAINING ACTIONS:**
 - **PROMULGATE GUIDANCE ON FORMAT AND CONTENT OF PLANS**
 - **ESTABLISH PROCESS/MILESTONES FOR DEVELOPMENT AND REVIEW OF PLANS**
- **RECOMMENDATION:**
 - **ESTABLISH GUIDANCE IN APPROPRIATE REGULATIONS**
 - **PUBLISH AR 385-64 AND DA PAM 385-64**

OPR: DA SAFETYi

POLICY AND REGULATION

- **ISSUE: STORAGE OF OEW**
- **STATUS:RED**
- **DISCUSSION:**
 - **ARMY POLICY IS THAT DISCOVERED CHEMICAL AND CONVENTIONAL EXPLOSIVE ORDNANCE ARE HAZARDOUS WASTE (REFERENCE MEMORANDUM, DASA (ESOH), 27 JAN 94,SUBJECT: APPLICATION OF RCRA REQUIREMENTS TO FUDS)**
 - **OFF-SITE STORAGE OF OEW MUST COMPLY WITH RCRA HAZARDOUS WASTE STORAGE REQUIREMENTS**
 - **AT FUDS, PREFERRED ALTERNATIVE IS ON SITE TREATMENT, IF APPROPRIATE**
 - **AMC HAS BEEN GIVEN THE MISSION TO RECEIVE AND STORE RECOVERED CHEMICAL WARFARE MATERIEL (RCWM) UNTIL FINAL DISPOSITION IS ACCOMPLISHED (REFERENCE MEMORANDUM, ASA(IL&E), 18 MAY 94, SUBJECT: NON-STOCKPILE CHEMICAL WARFARE MATERIEL)**
 - **NO CURRENT POLICY REGARDING WHICH ARMY MACOM HAS THE FUDS CONVENTIONAL OEW STORAGE MISSION**

POLICY AND REGULATION

- **ISSUE: STORAGE OF OEW (CONT)**
 - **LEVELS/STAGES OF STORAGE**
 - **REMEDICATION SITE STORAGE FOR OEW AWAITING TREATMENT OR TRANSPORTATION**
 - **OFF-SITE INTERIM STORAGE**
 - **FINAL STORAGE SITE FOR OEW AWAITING TREATMENT**
 - **IS THERE ADEQUATE SPACE?**
 - **EPA REQUIREMENTS FOR OEW/HAZARDOUS WASTE STORAGE**
- **REMAINING ACTIONS:**
 - **SITE(S) SELECTION (TO BE RECOMMENDED BY LONG TERM STORAGE SUBGROUP)**
 - **AMC DETERMINE WHAT MODIFICATION OF EXISTING STORAGE STRUCTURES IS NECESSARY FOR OEW**
 - **USACE PROVIDE AMC WITH POTENTIAL OEW STORAGE REQUIREMENTS**
 - **AMC IDENTIFY POTENTIAL OEW STORAGE SITES**
- **RECOMMENDATIONS:**
 - **FORMALLY ASSIGN THE FUDS CONVENTIONAL OEW STORAGE MISSION TO A MACOM**
 - **CONTINUE TO EMPHASIZE THAT ONSITE TREATMENT OF FUDS OEW IS THE ARMY'S PREFERENCE, AND THAT MOVEMENT TO AN OFF-SITE STORAGE FACILITY IS ONLY A LAST RESORT**
 - **ESTABLISH FUNDING POLICY FOR STORAGE OF OEW**
 - **USACE PROVIDE AMC WITH COST ESTIMATES**
 - **AMC BUDGET FOR REQUIRED OEW STORAGE**

1 OPR: AMCIUSACE

POLICY AND REGULATION

- **ISSUE: TRANSPORTATION OF OEW**
- **STATUS: RED**
- **DISCUSSION**
 - **DHHS REQUIRES THAT TRANSPORTING MUNITIONS POSE NO GREATER HAZARD TO THE GENERAL PUBLIC THAN ONSITE DESTRUCTION AT A MILITARY INSTALLATION**
 - **DOT CONCERNS**
 - **OVERPACKS, PACKAGING**
 - **POLICY ON USE OF MILITARY OR COMMERCIAL VEHICLES FOR OEW MOVEMENT**
 - **REQUIREMENTS FOR SHORT DISTANCE MOVES ONSITE TO A TREATMENT FACILITY**
 - **REQUIREMENTS FOR LONG DISTANCE MOVES TO REGIONAL OR NATIONAL TREATMENT FACILITIES**
 - **INTRASTATE**
 - **INTERSTATE**
- **REMAINING ACTIONS:**
 - **COORDINATION WITH DOT, AIR FORCE, NAVY COAST GUARD**
 - **COORDINATION WITH STATE AGENCIES**
 - **COORDINATION WITH LOCAL GOVERNMENTS**
- **RECOMMENDATIONS:**
 - **DEVELOP ARMY TRANSPORTATION POLICY TO INCLUDE:**
 - **PACKAGING/OVERPACK STANDARDS**
 - **DEVELOPMENT OF TIEDOWN REQUIREMENTS AND DRAWINGS**
 - **MILITARY OR COMMERCIAL VEHICLES TRANSPORT PREFERENCE**
 - **HAZARD CLASSIFICATION(S) FOR OEW**
 - **GENERIC OUTLINE/CHECKLIST FOR TRANSPORTATION PLANNING PURPOSES**

OPR: AMC/MTMC I

POLICY AND REGULATION

- **ISSUE: CERTIFICATION PROGRAM FOR OEW WORKERS AND TRANSPORTERS**
- **STATUS: RED**
- **DISCUSSION**
 - **CURRENT GUIDANCE BEING FOLLOWED BY USAEDH IS THAT EOD TRAINING IS REQUIRED**
 - **EOD-TRAINED TECHNICIANS ARE A LIMITED RESOURCE**
 - **IS EOD SCHOOL FULLY COMMITTED?**
 - **INITIAL CONTACTS BETWEEN DC SLOG AND NAVAL EOD SCHOOL, INDIAN HEAD, INDICATE EOD SCHOOL MAY BE ABLE TO TRAIN CONTRACTORS**
 - **DETAILS NEED TO BE WORKED OUT**
 - **AMC HAS A CERTIFICATION PROGRAM FOR ITS MUNITIONS DESTROYERS AND EXPLOSIVES OPERATORS, AS DO OTHER MACOMS**
 - **NO SPECIFIC ARMY GUIDANCE EXISTS**

POLICY AND REGULATION

- **REMAINING ACTIONS:**

- **ESTABLISH CERTIFICATION PROGRAM**
- **FORMALIZE TRAINING DETAILS WITH NAVAL EOD SCHOOL, INDIAN HEAD, MD**
 - **COURSE PROPONENT**
 - **NUMBER OF STUDENTS THEY CAN TRAIN ANNUALLY**
 - **DEVELOPMENT OF PROGRAM OF INSTRUCTION AND LESSON PLANS**
 - **FUNDING**
 - **STUDENT CERTIFICATION UPON GRADUATION**

- **RECOMMENDATIONS:**

- **A CERTIFICATION PROGRAM SIMILAR TO THAT IN PLACE AT AMC NEEDS TO BE ESTABLISHED FOR OEW WORKERS AND TRANSPORTERS**
- **ESTABLISH A SUITABLE COURSE AT EOD SCHOOL THAT MEETS THE REQUIREMENTS**

OPR: USACE/ODCSLOG